

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Proposed Counsel to the Legal Representative
for Future Talc Personal Injury Claimants*

In re:

PRESPERSE CORPORATION,

Debtor.¹

Chapter 11

Case No. 24-18921

Judge: Hon. Michael B. Kaplan

**SUPPLEMENTAL DECLARATION IN SUPPORT OF APPLICATION FOR
RETENTION OF YOUNG CONAWAY STARGATT & TAYLOR, LLP
AS COUNSEL TO THE LEGAL REPRESENTATIVE
FOR FUTURE TALC PERSONAL INJURY CLAIMANTS**

I, Edwin J. Harron, being of full age, hereby state as follows:

1. I am a partner in the firm of Young Conaway Stargatt & Taylor, LLP (“Young Conaway” or the “Firm”), Rodney Square, 1000 North King Street, Wilmington, Delaware 19801. Young Conaway is seeking authorization to be retained as counsel to Heather Barlow in her capacity as legal representative for future talc personal injury claimants (the “FCR”) in the above-captioned matter of Presperse Corporation (the “Debtor”).

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor’s tax identification number, is Presperse Corporation (7527). The mailing address for the Debtor for purposes of this chapter 11 case is 19 Schoolhouse Road, Somerset, NJ 08873.

2. I submit this supplemental declaration (the “Supplemental Declaration”) in response to certain inquiries from the Office of the United States Trustee (the “U.S. Trustee”) regarding the *Application for Retention of Young Conaway Stargatt & Taylor, LLP as Counsel to the Legal Representative for Future Talc Personal Injury Claimants* (the “Application”) [Docket No. 149] which included the *Certification of Edwin J. Harron in Support of Application for Retention of Professional* (the “Harron Certification”).

3. As disclosed in paragraph 6 of the Harron Certification, Young Conaway represents Amazon Capital Services, Inc. and Melaleuca, Inc. in matters wholly unrelated to this case. Young Conaway confirms that (i) its representation of Amazon Capital Services, Inc. constitutes less than 1% of the Firm’s gross income over the last two years and (ii) its representation of Melaleuca, Inc. constitutes less than 1% of the Firm’s gross income over the last two years.

4. Young Conaway continues to believe that (a) it is independent of the Debtor and the interested parties; (b) none of the matters disclosed in this declaration has had or will have an adverse effect on the Firm’s ability to carry out its duties to the FCR to loyally and effectively represent future claimants; and (c) pursuant to section 101(14) of the Bankruptcy Code, Young Conaway is a “disinterested person” and does not have any interest that is materially adverse to future claimants.

I certify under penalty of perjury that the above information is true.

Date: October 25, 2024

/s/ Edwin J. Harron

Signature of Professional

Edwin J. Harron

Name of Professional